To: Connors, Kevin C.[kcconnors@nd.gov]; McWhirter, Lisa[McWhirter.Lisa@epa.gov]
From: Boomgaard, Craig
Sent: Tue 8/13/2013 6:37:47 PM
Subject: FW: North Dakota

Craig Boomgaard

303-312-6794

From: Carol Davis [mailto:cadavistmt@yahoo.com]
Sent: Monday, August 12, 2013 9:37 AM
To: Boomgaard, Craig
Subject: North Dakota

I recommend that North Dakota's application to revise section 1422 Underground Injection Control be denied.

This is in response to the following....

In accordance with 40 CFR section 145.32(b)(2), the Environmental Protection Agency (EPA) hereby gives public notice that the EPA has received a complete program revision package from the State of North Dakota requesting approval of a revision to its section 1422 Underground Injection Control (UIC) program to include Class VI primacy; that the EPA has determined the application contains all the required elements; that the application is available for inspection and copying at the

address appearing below and public comments are requested and any member of the public may request a public hearing.

According to what I have learned, there is potential for carbon dioxide (CO2) emissions. I copied the following from an articles I found recently in articles related to this subject:

Boise Weekly, dated July 2012.

In 2000, energy giant Cenovus began injecting CO2 into an aging oil field to store carbon and force oil to the surface. Three years later, Cameron and Jane Kerr dug a couple gravel pits on their nearby farm in Saskatchewan, Canada. The pits filled in with water and soon the ponds bubbled, animals died and clots of foam bubbled up. The land was fizzing like soda pop.

First take the CO2-filled flue gases from the power plant. Then with a little hocus pocus, the gas is turned to a special liquid. Inject that liquid into the ground, and magically, the liquid becomes part of the rock and, poof--your little CO2 problem is gone. It's not that simple. It

might be a little more like a curse than a spell, or it least it has been for the Kerrs' farm.

PHYS.Org, October 2007

The University of Texas was awarded a 10-year grant in 2007 to study whether or not this is a safe method for storing CO2. The project will focus on the feasibility of injecting large volumes of CO2 at high rates into deep brine reservoirs. Officials said key issues will include estimating the CO2 storage capacity of brine reservoirs, understanding the effects of injection pressure and developing methods for documenting retention of CO2 in the injection zone. That was six years ago. They spent 1 1/2 years injecting the CO2. So, the actual study is less than 5 years old. How can we begin to use a method that has not proven safe by the government that said they needed 10 years to study it?

Read more at: http://phys.org/news112518073.html#jCp

Based on the information above, the application by the state of North Dakota to inject CO2 into the ground for storage is premature. If they choose to use this method of storage, I recommend that they wait until 2017 to submit their application when the results of this federally funded study is complete. And, if the method is proven unsafe, I

recommend that their application be denied at that time.

Sincerely,

Carol Davis

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Belcourt, ND 58316